

Response to *Geographic telephone numbers: safeguarding the future of geographic numbers*

Submitted by: Name Withheld 2

Question 1 – no comment.

Question 2 Do you agree that we should not consider further at this stage options that would change existing numbers?

No. Short-term benefits to today's users should not take precedence over long-term usability and the availability of suitable numbers for future generations. Renumbering at least has the benefit of being only a temporary irritation, when compared with the permanent inconvenience of limited capacity, overlays and loss of local dialling.

Areas referred to in the consultation have largely avoided renumbering since 1995, with many local numbers unchanged for even longer. A simple change for the first time in 20+ years seems a reasonable trade-off for a lasting increase in capacity and the avoidance of unpopular overlays or local-dialling changes. It would also be consistent with the Futuresight research¹ that suggested 10 years should be the minimum period between changes and the view of some respondents that a code change may be preferable if it gives a simpler, more long-lived solution.

There are costs involved with number changes, but these have surely reduced over the last decade as there has been a significant switch from printed documents to readily-updatable electronic communication. Indeed, many businesses have repeatedly switched between geographic, 0870, 0845 and 0871 numbers voluntarily as the incentive to maximise call revenue has apparently outweighed any expense in publicising number changes.

Costs and inconvenience for users could also be reduced though extended periods of parallel running of old and new numbers or by providing long-term automated 'changed number' announcements. CPs may claim this is burdensome, but the limited costs of implementation should surely be seen as fair compromise when viewed in light of their failure to share number blocks in quantity and the fact that Ofcom is saving CPs significant expense by not requiring them to implement routing at the 100 number block level.

Above all, it would be wrong to rule out renumbering where it offers a more stable, permanent solution than overlays and demand suppression. Limiting demand, rather than releasing suitable supplies from the huge pool of available numbers, risks stopping an innovative telecoms industry from offering new and useful services using the geographic numbers people want to use.

Question 3 Do you agree that local solutions are appropriate based on our current forecasts of anticipated requirement of more numbers?

Possibly, although where several nearby areas are likely to require solutions within a few years of each other it would be considerably more efficient to tackle them together.

¹ <http://stakeholders.ofcom.org.uk/binaries/consultations/geographic-numbers/annexes/numbering-futuresight.pdf>

Areas which are not experiencing number shortage should continue to provide the useful local dialling facility. Local dialling already depends on local knowledge and residents will quickly learn any 'unusual' rules for their area. Meanwhile, people simply visiting an unfamiliar area are likely to dial in full or make any calls from their mobile, thus never encountering the issue.

Question 4 Do you agree with our assessment of the options for providing new supplies of numbers in four-digit code areas, as presented in Section 4 and in Annex 3?

No. Though the assessments of the options presented are reasonable, other viable options have been omitted. These include migration to new 3+7 area codes, the use of donor capacity from neighbouring areas and alternative ways of implementing overlays (see Question 6).

Question 5 Do you agree that closing local dialling followed, if necessary, by the introduction of an overlay code should be the preferred option for providing new supplies of numbers in four-digit areas that may need them? Please give reasons for your answers, and provide evidence where possible.

No. Research has told Ofcom that the public do not want to see overlay codes and more robust plans should be made to avoid them, rather than adopting plans that are likely to just defer them. While the loss of local dialling could be acceptable if it was a permanent solution, it would seem short-sighted to remove a useful facility when doing so can only be a delaying tactic for further more significant change.

Ofcom acknowledges that number demand has repeatedly exceeded expectations and there could well be further surges in demand triggered by adoption of new technologies: households might start needing multiple numbers for individual VOIP accounts instead of the traditional shared number, for example. We could also easily see significant new demand for geographic numbers for mobile phones, as suppliers have begun to offer this service more cheaply than ever before². Capacity should be made available for such growth in usage if it benefits consumers, instead of trying to choke demand for popular geographic numbers.

In some areas the 25% increase in capacity arising from closing local dialling cannot possibly be considered a solution when external factors are considered. Milton Keynes, for example, is likely to double in size over the next 20 years³ so needs to be provided with far more capacity.

In some areas, the pool of new numbers released by closing local dialling is even smaller, with a substantial quantity of local numbers beginning with 0 and 1 already in use for 'national dialling only' applications; 9% of such capacity in Bournemouth 01202 is already taken, for example⁴. This reduces the likelihood of closing local dialling being a suitable solution still further.

Question 6 Are there any other number supply measures that we should consider for four-digit areas?

Point 6.1:

² <http://www.itpro.co.uk/629989/orange-introduces-pocket-landline-for-smbs>

³ <http://www.milton-keynes.gov.uk/mkgrowth/>

⁴ F blocks in use as at 17 December 2010, source: <http://www.ofcom.org.uk/static/numbering/>

Make use of capacity available within **existing** 02x and 011x codes. For example, Warwick 01926 could use spare capacity from the neighbouring and familiar Coventry 024, rather than an alien, overlaid 4+6 code. Similarly, only 21% of local numbers in Nottingham 0115 are in use⁵ and demand for neighbouring Mansfield could easily be absorbed.

Point 6.2:

A simpler, cheaper and more robust way to provide capacity for growth while avoiding number changes for existing users would be not to close local dialling, but to immediately introduce a higher-capacity 3+7 or 2+8 format overlay to high demand areas as they reach exhaustion, with a view to eventually retiring the original 4+6 codes.

For example, Bournemouth 01202 could be overlaid with a new 3+7 area code of 0119, which would be used for all newly-issued numbers. There would be no enforced migration of existing users away from the original 4+6 code, but no new 01202 numbers would be issued (in a similar way to how the remaining 0500 freephone numbers are managed).

The new 0119 area code would cater for all new demand, with use of the 01202 code naturally diminishing over the years as lines and services using 01202 numbers are cancelled through normal customer churn. There would then be the option to ultimately withdraw the 01202 code in the longer term, should usage drops to a low enough level. (Large users may well voluntarily adopt numbers from the new code, if they could secure contiguous DDI blocks that are currently in short supply, while smaller users with 01202 numbers could from the outset be offered the **option** of a new 0119 number, just as how equivalent 03x numbers have been available for users wanting to migrate away from 08x ranges.)

This scheme would be no more complex than Ofcom's own overlay proposals and gives various benefits:

- No number changes required,
- Lower publicity costs due to a single-stage change. Other options generate cost first in publicising local dialling changes, then further expense each time an overlay is introduced,
- Meets the stated objective for changes to last at least ten years by releasing much more capacity for each area than a 4+6 overlay. (Leeds could be well into its *fourth* area code by now, if it had gained 4+6 overlays instead of converting to a 3+7 area in 1995),
- Reduced likelihood of misdialling: greater visual difference between 4+6 and 3+7 numbers, while users in the new 3+7 code who mistakenly dial the 6-digit 'local' version of a number from the old 4+6 code would simply not be connected,
- Retaining local dialling between existing 01202 numbers would significantly reduce risks to vulnerable users, as there is no change in how to dial existing, familiar numbers,
- The option for an area to easily return to a single area code with convenient local dialling in the longer term, with no additional disruption, and

⁵ As at 17 December 2010, considering stated F block usage, source: <http://www.ofcom.org.uk/static/numbering/>

- Less risk of end users being exploited, by removing the opportunity for CPs to issue stockpiled numbers from the old code at a premium price.

This option is no more difficult or confusing than the Option 1 proposal for a two-stage change (i.e. local dialling changes, then later overlay introduction), but gives more capacity and a clear route back to a single area code in future, if desired.

There is ample room in the numbering plan to accommodate such an option. As well as at least 13 immediately available 01xx codes (0110, 0111, 0119 and 0100 to 0109), there is room in the 02 range for several new 3+7 or 2+8 codes. It would seem logical to use this spare space and make it available to users in larger quantities than 4+6 overlays would allow. The alternative is that capacity is artificially restricted and that Ofcom will continually have to pursue aggressive demand management policies that restrict growth and innovation despite there being a huge stockpile of available capacity within the wider 01 and 02 ranges. Indeed, making fuller use of the 01 and 02 ranges is perfectly reasonable when there is so much spare capacity available in the 03, 04, 05, 06, 08 and 09 ranges for other future uses.

Even if, ultimately, it were decided not to withdraw the original area codes affected, it would make sense to adopt the approach of higher capacity overlays, as this makes more effective use of currently unused numbering space, eliminates the risk of having more than one overlay in an area and leaves more options open for the future.

Point 6.3:

4+5 number blocks still exist in several areas. 4+5 numbers should no longer be available for new issue or adoption, to allow the eventual reclaiming of such blocks for use in 4+6 format.

Point 6.4:

If overlays must be used, consider multiple, geographically-targeted overlays in areas of highest demand. For example, rather than repeatedly introducing new area-wide overlays for Bournemouth 01202, provide one dedicated 4+6 overlay for each of Poole, Bournemouth and Christchurch from the outset. This addresses the concern of a second overlay being necessary within 7 years and removes the need for repeated changes and publicity campaigns.

It may also aid uptake and acceptance of overlays if they are linked to distinct communities currently buried within existing code areas. For example, while Poole residents might dislike being given a number from an unfamiliar new 'second-best' Bournemouth overlay code, they might perhaps welcome a number from a new 'Poole' area code exclusive to their own town. (There is a parallel here with how the old London 071 code quickly became desirable, once people realised it pinpointed them as being based in Central London, unlike the less-specific London-wide 01 code they had previously used).

Question 7 Do you agree that we should merge five-digit codes with four-digit codes to create new supplies in five-digit code areas that need them? Do you have any comment on our assessment of the impacts of the options we have considered? If so, please provide relevant evidence where possible.

This is entirely sensible, both creating capacity and removing a confusing anomaly. While Option 2 requires changes to local dialling this would be no worse than the change required by the overlay alternative. Communicating such changes should not be prohibitively difficult; far more complex code mergers were carried out across rural areas of the UK in the late 1980s and early 1990s without incident, e.g. (097084) xxx becoming (0970) 880xxx.

Alternatively, given the fact that so many areas in the North West need new capacity, consider providing overlay capacity from (or migrating to) a new 2+8 code area covering Cumbria and Lancashire. Ofcom's proposals all require changes to local dialling patterns and familiar codes in the 5+5 code areas; a renumbering to 2+8 would cause little more inconvenience but would be considerably more future-proof.

Question 8 Are there any other numbers supply measures that we should consider for five-digit areas?

Hornby 015242 may be better served by moving directly to a new 4+6 area code. This would be little more inconvenient than merging with Lancaster 01524, but would further delay changes for Lancaster. Longer term, each area having its own 4+6 area code with local dialling, rather than both areas sharing overlaid, closed 4+6 codes would seem to be more user-friendly.

Question 9 Do you agree with our considerations and preliminary conclusions on how new supplies of numbers should be provided where they are required?

No. Demand has been underestimated repeatedly in the past, so a more robust plan is needed, rather than continual uncertainty and instability as each area inevitably reaches capacity and requires at least a two-stage change.

Overlays as proposed will frustrate the duty to encourage competition and innovation and the first step of closing local dialling does not do enough to prevent them becoming necessary – Annex 3 in fact refers to them as a method of deferring overlays rather than preventing them.

Many innovative services using local numbers have appeared recently (e.g. VOIP providers offering locally-dialable, locally-recognisable numbers at a far lower cost than via traditional phone service provider). The huge number of end users adopting 01 and 02 numbers for their VOIP phones and corporate networks, while shunning the 055 and 056 ranges⁶, shows that we should plan for growth where consumers clearly want it rather than stifle demand.

The ability for new entrants to give customers the local identity they desire and value will always be compromised in an area that is permanently overlaid, which will inevitably have a 'best' code: New York City has six area codes but having the original 212 code is still seen as an advantage. Even if the population can be made to accept an overlay code is local, any business using it will inevitably be seen as a newcomer rather than as an established business.^{7 8}

Ultimately there is a significant consumer protection issue, as a permanent overlay code risks end users being exploited by telephone companies and resellers who will naturally seek to charge premium prices⁹ for scarce but desirable numbers from the 'preferred' area code. This is very much against the interests of the consumer and also unfairly favours the incumbent telephone companies who have a supply of numbers from the original area code.

Some thought should also be given to Ofcom's ongoing work on mobile call termination costs. We may see a new wave of demand for geographic numbers for mobile phones once

⁶ <http://stakeholders.ofcom.org.uk/consultations/simplifying-non-geo-numbers/>

⁷ <http://dealbook.nytimes.com/2010/08/20/n-y-c-start-ups-have-area-code-envy/>

⁸ <http://blogs.wsj.com/digits/2010/08/18/212-lust-old-phone-numbers-are-new-thing-in-tech-scene/>

⁹ <http://212areacode.com/>

termination rates drop and make this a more affordable option. This could easily exceed the 'best scenario' 25% increase in capacity gained by simply closing local dialling.

Questions 10 to 18 – no comment.

Question 19 Do you agree with the high level objectives proposed for the charging regime?

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Questions 20 to 21 – no comment.

Question 22 Do you agree with our preferred option for charging for geographic numbers? (i.e. Option 2 Pilot scheme: Charge a flat rate of 10p per number per annum in area codes with 100 or fewer blocks of 1,000 numbers (no charge for other areas). If not, please state your reasoned preference.

If essential, though it seems wrong to take the route of choking demand for numbers that people want to use, rather than simply releasing capacity from the significant reserves available.

Questions 23 to 25 – no comment.

Question 26 Do you agree that we should not pursue a policy of charging for golden geographic numbers? If you do not agree, please provide your reasoning.

Yes. Not all CPs surcharge end users for golden numbers, so it would be wrong to introduce a system which may push them into doing so. Charging for golden numbers would also unfairly add to costs for users of large, contiguous DDI number blocks ranges that coincidentally include individual numbers arbitrarily considered 'golden'.

Profits made by CPs that do surcharge for golden numbers are probably more efficiently covered by general taxation than by complex charging schemes. If networks eventually evolve to the point where Ofcom can issue numbers to CPs or end users individually instead of in blocks, there would be merit in revisiting the matter.

Question 27 – no comment.